

REMARKS/ARGUMENTS

The Office Action dated June 29, 2007 has been received and duly noted. Claim 1 was rejected as being anticipated by U.S. Patent 7,062,960 to Couren. Applicant submits that there are significant differences between the Couren reference and Claim 1 of the present application, although the claim has been amended to further distinguish from the cited art.

Claim 1 is directed to a subsea drilling/completion system which includes both a surface blowout preventer disposed on the riser above the sea surface, and a subsea blowout preventer below the sea surface and substantially adjacent to the subsea wellhead. Claim 1 further recites a tubing hanger disposed within or adjacent the subsea wellhead for suspending tubing in a well below the subsea wellhead, and a retrievable tubing hanger running tool adapted to run the tubing hanger through the riser on the running string, disengage a tubing hanger, and then return to the surface of the well with the tubing hanger within or adjacent the subsea wellhead. The tubing hanger running tool is controlled by hydraulic pressure.

Amended Claim 1 is thus in stark contrast to U.S. Patent 7,062,960, which is directed to a test tool which is used in or adjacent a subsea blowout preventer and a subsea wellhead. The Examiner has contended that the reference teaches the combination of a subsea blowout preventer and a surface blowout preventer, but this is clearly not true. The reference specifically shows a subsea blowout preventer, and col. 2, line 10 referenced by the Examiner indicates that the assembly of Couren might be used with either a subsea blowout preventer or

a surface blowout preventer. Nothing in the cited reference discloses or suggests the combination of a subsea blowout preventer and also a surface blowout preventer. Those skilled in the art recognize that if a subsea blowout preventer is provided, a surface blowout preventer is generally considered unnecessary. According to the subsea drilling completion system of the Claim 1, the combination of both a surface and a subsea blowout preventer are provided.

Claim 1 is further distinguishable from the '960 Patent which does not disclose or suggest a tubing hanger disposed within or adjacent the subsea wellhead. Rather, the reference teaches a test tool which is lowered to a location adjacent a subsea wellhead, but this test tool is not used for suspending tubing in the well below the subsea wellhead, as recited in amended Claim 1. Moreover, the running tool disclosed in the '960 Patent does not run a tubing hanger through the riser, and does not disengage from the test tool so that the running tool is returned to the surface while the test tool is left downhole. For these reasons, amended Claim 1 is considered patentably distinguishable over the '960 Patent.

With respect to the dependent claims, the cited reference does not teach or suggest the tubing hanger running tool being controlled by hydraulic pressure communicated through the landing string, as recited in Claim 4. The Examiner references Figure 4 of the '960 Patent, but the disclosure of this patent indicates that a test tool, not a tubing hanger running tool, is controlled by hydraulic pressure. With respect to dependent Claims 3 and 19, Applicant does not understand how the running tool in the cited reference is allegedly controlled by

hydraulic pressure communicated inside the riser and outside the landing string. Test pressure is supplied from outside the riser. Similarly, the limitations of Claim 4 and 20, 5 and 23 and 15 and 33 are not shown in Figure 4 or the discussion of Figure 4. With respect to Claims 5 and 23, the claim amendments make it clear that the protective structure is within the subsea BOP and is radially outward of the umbilical line for protecting the umbilical line. This is not disclosed in Figure 9 of the cited reference, wherein no umbilical line is radially within the protective structure.

With respect to Claims 13 and 31 and 15 and 33, the tool in the cited reference is a test tool, not a tubing hanger running tool. The reference does not teach an umbilical line extending inside the landing string.

Independent method Claim 17 has also been amended, and now recites providing a surface blowout preventer disposed on the riser above the sea surface, and a subsea blowout preventer below the sea surface and substantially adjacent to the wellhead. As noted above, this combination is not disclosed in the cited reference. Amended Claim 17 further recites that a tubing hanger running tool is used to run a tubing hanger through the riser and suspend tubing in the well below the subsea wellhead. Again, the cited reference does not teach this step. The claim further recites disengaging the tubing hanger running tool from the landed tubing hanger, returning the tubing hanger running tool to the surface of the well. This step similarly is not provided in the cited reference.

Newly added Claims 35-38 relate to an annulus line and a radial penetrator, and are not shown in the cited reference.

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In view of the foregoing amendments and remarks, it is respectfully submitted that all claims are in condition for allowance.

Respectfully submitted,



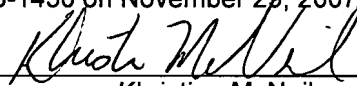
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